

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF OKLAHOMA**

IN RE BROILER CHICKEN GROWER
ANTITRUST LITIGATION (NO. II)

This Document Relates To: *All actions*

Case No. 6:20-MD-02977-RJS-CMR

Chief Judge Robert J. Shelby
Magistrate Judge Cecilia M. Romero

DECLARATION OF CHRISTOPHER J. ABBOTT

I, Christopher J. Abbott, declare as follows:

1. I am a member in good standing of the bars of the District of Columbia, New York, and Massachusetts and an attorney at the law firm Weil, Gotshal & Manges LLP, representing Defendant Pilgrim's Pride Corporation in this matter.

2. Attached as Exhibit A hereto is a true and correct copy of excerpted cited pages from the transcript of the November 1, 2021 deposition of James Heatherly.¹

3. Attached as Exhibit B hereto is a true and correct copy of e-mails, dated October 19, 2021, from Plaintiffs' counsel Gary I. Smith, Jr. to myself.

4. Attached as Exhibit C hereto is a true and correct copy of letter correspondence, dated November 2, 2021, from Plaintiffs' counsel Kyle G. Bates to myself.

5. Attached as Exhibit D hereto is a true and correct copy of letter correspondence, dated November 10, 2021, from myself to Plaintiffs' counsel Kyle G. Bates.

6. Attached as Exhibit E hereto is a true and correct copy of letter correspondence, dated November 15, 2021, from Plaintiffs' counsel Kyle G. Bates to myself.

¹ Any errata to Mr. Heatherly's deposition transcript remain pending at this time.

7. Attached as Exhibit F hereto is a true and correct copy of e-mails, dated November 2, 2021 through November 18, 2021, among various parties, related to Mr. Heatherly's deposition.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct. Executed on this 24th day of November, 2021.

Dated: November 24, 2021

Respectfully submitted,

/s/ Christopher J. Abbott

Christopher J. Abbott